

FILED  
U.S. DISTRICT COURT  
DISTRICT OF MARYLAND

2012 NOV 30 P 4: 55

UNITED STATES DISTRICT COURT  
DISTRICT OF MARYLAND

CLERK'S OFFICE  
AT BALTIMORE

WOODBIDGE STRUCTURED  
FUNDING, LLC

Plaintiff

VS.

SOVEREIGN FUNDING D/B/A WE BUY  
PAYMENTS

AND

DAVID SPRINGER

Defendants

Case No. 11-CV-03421-MJG

November 30, 2012

**MOTION FOR EXTENSION OF SCHEDULING ORDER**

The Plaintiff moves for an extension of the Scheduling Order dated June 21, 2012 as follows:

- a. Completion of fact discovery: March 31, 2013.
- b. Expert Discovery, a): April 30, 2013.
- c. Expert Discovery, b): June 30, 2013.
- d. Summary Judgment Motion Deadline: July 30, 2013.

In support of this motion, the Plaintiff submits that it has diligently engaged in discovery since the commencement of this action, including by service of its first set of Interrogatories and Requests for Production on the Defendants on June 14, 2012. Unfortunately, numerous discovery disputes, including lengthy motions to compel, difficulty in locating specific witnesses for depositions, as well as a witness' failure to

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*Motion Granted. Deadlines extended  
as noted herein. 11-30-12 [Signature]*

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